

1 LISA J. ZASTROW, Esq.
2 Nevada Bar No. 009727
3 JASON M. BACIGALUPI, Esq.
4 Nevada Bar No. 012685
5 **KOLESAR & LEATHAM**
6 400 South Rampart Boulevard, Suite 400
7 Las Vegas, Nevada 89145
8 Telephone: (702) 362-7800
9 Facsimile: (702) 362-9472
10 E-Mail: lzastrow@klnevada.com
11 jbacigalupi@klnevada.com

12 *Attorneys for Defendant, Great Clips, Inc.*

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

KOLESAR & LEATHAM
400 S. Rampart Boulevard, Suite 400
Las Vegas, Nevada 89145
Tel: (702) 362-7800 / Fax: (702) 362-9472

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 * * *

14 NERINDA ROBINSON, individually,

15 Plaintiff,

16 vs.

17 GREAT CLIPS, INC., a Foreign Corporation;
18 BRANDEE CHAMBERS, individually,

19 Defendants.

20 CASE NO. 2:15-CV-01162-APG-VCF

21 **STIPULATION AND ORDER TO**
22 **HOLD IN TEMPORARY**
23 **ABEYANCE GREAT CLIPS' DUTY**
24 **TO RESPOND TO THE**
25 **COMPLAINT AND ATTENDANCE**
26 **AT EARLY NEUTRAL**
27 **EVALUATION**

28 Plaintiff NERINDA ROBINSON ("Robinson") and Defendant GREAT CLIPS, INC. ("Great Clips"), through their undersigned counsel, hereby stipulate and agree to the following:

1. The time in which Great Clips shall answer, move, or otherwise respond to Plaintiff's Complaint shall be extended to 30 days after completion of the Early Neutral Evaluation ("ENE") between Plaintiff and the other named Defendant in this action, Brandee Chambers ("Chambers"). By stipulating to this extension, Great Clips is not consenting to the jurisdiction of this Court and is not waiving any defense to Complaint. Great Clips expressly

1 reserves the right to raise and assert, through motion or otherwise, all defenses, including, but not
2 limited to, those defenses set forth in Rule 12 of the Federal Rules of Civil Procedure.

3 2. In addition to the foregoing, the parties stipulate that Great Clips shall not be
4 required to participate in the Early Neutral Evaluation scheduled by the Court in connection with
5 this matter given that Robinson's standing to assert claims against Great Clips is disputed.
6 Robinson and Chambers, with their counsel, shall participate in the Early Neutral Evaluation in
7 an attempt to resolve the issues/disputes raised in this lawsuit. If Robinson is able to reach a
8 resolution with Chambers, this matter shall be dismissed in its entirety, including all claims
9 against Great Clips, and Robinson agrees that she will not subsequently pursue any such claims
10 against Great Clips.

11 3. Robinson and Great Clips respectfully request that the Court approve this stipulation.

12 COHEN & PADDA, PLLC

13 /s/ Paul Padda

14 Paul Padda, Esq.
15 Nevada Bar No. 010417
16 4240 West Flamingo Road, Suite 220
17 Las Vegas, NV 89103
18 *Attorneys for Plaintiff Nerinda Robinson*

KOLESAR AND LEATHAM

/s/ Lisa J. Zastrow

Lisa J. Zastrow, Esq.
Nevada Bar No. 009727
400 S. Rampart Blvd., Suite 400
Las Vegas, NV 89145
19 *Attorneys for Defendant Great Clips, Inc.*

20 **IT IS SO ORDERED:**

21 The Stipulation is hereby approved.

22 GREAT CLIPS is relieved of its obligation to attend the forthcoming ENE and its
23 response to the Complaint is hereby extended to 30 days after the ENE.

24 Dated this 16th day of July, 2015.

25 

26 UNITED STATES MAGISTRATE JUDGE